



Board of Directors  
Barry M. Jameson  
*President*

David A. Wells  
*Vice President*

Roger Miller  
Gary J. Morris  
Scott Niblett

Harry O. Starkey  
*General Manager*

J.D. Bramlet  
*Director of Operations*

Sanjay "Sunny" Kapoor  
*Director of Finance*

VIA E-MAIL

Jeanine Townsend, Clerk to the Board  
commentletters@waterboards.ca.gov

**Re: Comment Letter—May 18, 2016 Board Meeting (Conservation Extended  
Emergency Regulation)**

Ms. Townsend:

On behalf of the West Kern Water District, I want to express my appreciation for the effort that the Water Board has made to overhaul the emergency conservation regulations given current water conditions.

The new emergency regulations create an opportunity to apply a regulatory wrinkle that local suppliers have advocated for: consideration of banked supplies. Many suppliers have developed years' worth of banked supplies for the purpose of maintaining service levels through droughts. The new regulations reward those suppliers, some of whom will now have minimal conservation standards.

The Water Board should resist calls to amend the proposed emergency regulations to impose any 'minimum' or 'floor' conservation standard. Suppliers with minimal conservation standards will have earned those standards through proper drought planning. Those same suppliers will continue to plan, store, and conserve for future droughts even as they draw down supply to see their way through the current dry years.

The new regulations also create an opportunity to test drive supply based regulations. The original conservation regulations focused almost exclusively on demand reduction. As written, the new regulations focus more on supply. If the regulations remain as they are, they will give the Water Board and local suppliers valuable experience with applying supply based conservation measures. That experience will inform future decisions if, and likely when, board conservation regulations are necessary in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Starkey".

Harry Starkey  
General Manager